

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

THE UNITED STATES OF AMERICA

VS. * CRIMINAL ACTION NO. 1:18-CR-143-1

PATRICK WAYNE BRONNON * JUDGE MARCIA CRONE

**DEFENDANT'S OBJECTIONS
TO GOVERNMENT EXHIBITS AND WITNESSES**

EXHIBIT 15- pages 112-162

The defense objects to pages 112-262 of exhibit 15. This section of the exhibit transcribes an interview of Mr. Bronnon by Edward Beasley of Farmers Insurance Group regarding an incident that took place on or about May 19, 2016 at 4601 Sunken Court, Port Arthur, Texas. The interview takes place on June 28, 2016 at 11:00 a.m. Darren Ravey of Farmer's Insurance is also present.

The defense objects that this portion of the exhibit as Hearsay and as a Crawford violaton.

Crawford v. Washington 541 U. S. 36 (2004). Mr. Bronnon was interviewed without counsel and was not given an opportunity to confront the witnesses against him. Mr. Beasley questioned Mr. Bronnon about his involvement in previous insurance claims. The defense was not given an opportunity to examine the witnesses, investigative agencies, or examiners involved in any of the claims.

EXHIBIT 15- pages 538-691

The defense objects to this portion of the exhibit. This is an Examination under

Oath of Mr. Bronnon taken by Ronnie E. Pfeiffer, an attorney for Farmer's Insurance Group on December 1, 2016 regarding the same claim associated with 4601 Sunken Court, Port Arthur, Texas. Mr. Bronnon was represented by counsel at this examination but the defense's objection is the same as above. Hearsay and a Crawford violation. Counsel had no opportunity to confront witnesses regarding Mr. Bronnon's role in the previous claims that the examiner questioned him about.

EXHIBIT 15-pages 350- 538

The defense objects again to this interview being admitted into evidence. It is a continuation of the Examination under Oath above. It was continued on February 16, 2017. The examination was conducted again by Mr. Pfeiffer. Mr. Bronnon was represented by counsel. Defense again objects on grounds of Hearsay and a violation of Crawford. Mr. Bronnon was not afforded an opportunity to confront the witnesses in the matters that Mr. Pfeiffer questioned him about.

WITNESS NO. 15

David Cook, National Loss Consultants, Friendswood, Texas. The defense believes Mr. Cook may be conflicted and requests that he be questioned outside the presence of the jury.

Respectfully submitted,

/S/ Joel Vazquez
Joel Vazquez
1900 Broadway
Beaumont, TX 77701
(409)242-0310
(409)832-4393
SBN 24047031